



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

04AR

September 3, 2004

Mr. Frank Thomas, Director
Department of Public Works
227 Maple Street
Manchester, NH 03103

RE: NPDES Small MS4 General Permit Number NHR041017

Dear Mr. Thomas:

Thank you and your staff for meeting with me on April 20, 2004. The meeting provided an opportunity for me to gain an understand of your Storm Water Management Program as well as an opportunity for you to express any questions or concerns. I truly appreciate Rick Cantu's efforts in preparing for our meeting. It allowed the meeting to flow smoothly and productively. The purpose of this letter is to summarize the items we discussed at our meeting. It also serves as an opportunity to provide comments on the City's first annual report and on the progress made in implementation of the City's SWMP.

Other Small MS4 within the City

In addition to the "non-traditional" small MS4 identified on the City's Notice of Intent, the Veteran's Hospital located on Smyth Road may also be a non-tradition municipality subject to the storm water program. At a recent meeting I spoke with various representatives from the VA hospitals in the region. Staff from the VA hospital in Manchester approached me and asked for information about the storm water program. I gave them information about the program as well as Rick's name as a contact for the City.

Public Education and Outreach

The City identified six Best Management Practices for this minimum control measure, most have been started and some completed.

- The City's website has been developed and is active. In additional to having a great deal of information it is also user friendly. Good job.
- Many of the City's SEPP projects dovetail with the general permit requirements. Since the SEPP is nearing completion, the City should try to identify sources of funding or partnership opportunities to continue the progress that has been made to date.

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

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- Enclosed is a listing of available resources for the storm water program. Some of these resources may help you in development of your brochures targeted for years three through five.

Public Participation

- Hazardous waste collection days are a great opportunity to share information with the community. It is great that you are able to do more than one a year. The annual report documents amounts of many wastes which were collected, you may want to consider future goals such as incremental increases of collected wastes.
- The Green Street Program is a program which allows residents to request the City to plant trees in their yard. Last year the City planted 168 trees. You indicated that the City will continue with this program. You may want to identify a tree planting target for next year.
- You stated that the storm water hot line has been operating since August 2003, but you are trying to make it more visible. The City planned to include the hotline number in the sewer bill and on storm drain stencils. Also consider placing the number on a magnet or book mark for distribution at town hall, the public library or other community event.
- The City also has a newsletter, "The City Matters". This is a good tool to inform not only the non-DPW city employees of the storm water program, but the community as well.

Illicit Discharge Detection and Elimination

- You stated that your goal is to have an IDDE ordinance in place by Spring 05. The draft ordinance has been developed and shared not just with the City, but other communities in the Merrimack River Group. Sharing documents such as this in their draft stages is a good approach to developing a document which is useful. If I have any comments on the ordinance, I will forward those under separate cover.
- Both the New England Interstate Water Pollution Control Commission (NEIWPCC) and the Center for Watershed Protection (CWP) have developed illicit discharge detection manuals. They can be downloaded from www.neiwpcc.org and www.cwp.org.
- Clearly, the City's priority is the urban ponds and you have spent a great deal of effort to preserve these resources. Have you identified any other priority areas?
- The City's sewage and drainage system was mapped by CDM in early 2001. Annual growth and repairs are input into the GIS system. The information in the Notice of Intent concerning the number of outfalls to each listed receiving water is listed as "unknown", this information should be updated to be more reflective of the information contained in

the GIS system.

- Implementation of the PDA/laptop system within the department sounds very promising. The annual report for next year can address how the system is working and any changes.

Construction Site Runoff Control and Post Construction

- The regulatory mechanisms required by the general permit for these two minimum control measures will be included in the ordinance developed under minimum control measure 3.
- The City has developed check lists to assist in the construction process from pre construction to project completion. The goal was to have these implemented in the 2004 construction season. Future annual reports should address how the check lists are working. The check lists may also provide an indication about the effectiveness of City's construction program.
- The City is also planning a BMP Manual for use by planners and developers. The enclosed resource list has some references which could assist you in the development of the manual.

Pollution Prevention and Good Housekeeping

- The city has aggressive catch basin cleaning and street sweeping programs. You reported that 798 catch basins were cleaned between May 2003 and April 2004. You may want to report what percentage of all catch basins that number represents. You may also wish to keep track of the volume of material removed from the catch basins and streets. In addition to using the debris from these operations as fill, you may want to investigate other options for their use.
- Salt usage has become a hot topic in New Hampshire, especially along the I-93 corridor. Continue efforts to minimize salt usage as well as investigations of alternatives to salt. A listing of sources of information on anti-icing enclosed.
- You have done quite a bit of employee training including the street crew, the engineering department and other city staff. Future training activities can expand to focus on other city departments.
- You planned some activities with the Derryfield Country Club. A meeting was proposed in May or June 2004. Continue to report on the progress of the implementation of the pollution prevention activities planned for the golf course. You can also address other municipal areas such a fleet maintenance, building maintenance, and grounds maintenance.

The City has done a good job of developing and implementing its Storm Water Management Program. Continue to build on the progress made. Again, thank you and your staff for meeting with me. If you have any questions, feel free to contact me at 617.918.1615.

Sincerely,

A handwritten signature in black ink, reading "Thelma L. Murphy". The signature is fluid and cursive, with the first name "Thelma" and last name "Murphy" clearly distinguishable.

Thelma L. Murphy
Regional Storm Water Coordinator

Enclosures

Anti- Icing Information:

FHWA - Federal Highway Administration
RWIS - Road Weather Information System

FHAW : www.fhwa.gov

The FHWA website concerning RWIS: <http://www.aurora-program.org/index.cfm>

This is a link to a nationwide study of the salt issue jointly conducted by USGS and FHWA. :
<http://ma.water.usgs.gov/fhwa/>

The FHWA anti-icing manual is here: <http://www.fhwa.dot.gov/reports/mopeap/mop0296a.htm>
The manual is 67 pages.

2001 Cost/Benefit Analysis of RWIS and anti-icing: [http://www.sicop.net/NCHRP20-7\(117\).pdf](http://www.sicop.net/NCHRP20-7(117).pdf)

Salt storage in CT: <http://www.cga.state.ct.us/2000/rpt/olr/html/2000-r-0129.htm>

Maine application rates: <http://www.state.me.us/mdot/community-programs/csd/saltapprates.php>

Here are a few sample websites of RWIS programs at the state level.

Boston (article): <http://www.fhwa.dot.gov/winter/roadsvr/CS036.htm>

Vermont: <http://www.control-products-inc.com/PDFs/ss-prn.pdf>,
<http://www.aot.state.vt.us/WinterMaintenancePlan.htm>

Pacific NW Snowfighters: <http://www.wsdot.wa.gov/partners/pns/default.htm>

Nevada: <http://www.nevadadot.com/traveler/rwis/>

California: <http://www.dot.ca.gov/dist2/rwis/oregon.php>

Montana: <http://www.mdt.state.mt.us/travinfo/weather/rwis.html> (click on a green triangle to see info)

Illinois:

<http://tinyurl.com/yruzh>

Canada: FAQ :http://www.ec.gc.ca/Press/2001/011130-2_b_e.htm